

Ruth Ann Price
Hearing Examiner
Delaware Public Service Commission
Canon Building, Suite 100
861 Silver Lake Boulevard
Dover, DE 19904

January 24, 2008

**RE: IN THE MATTER OF INTEGRATED RESOURCE PLANNING FOR THE
PROVISION OF STANDARD OFFER SUPPLY SERVICE BY DELMARVA
POWER & LIGHT COMPANY UNDER 26 DEL. C. § 1007(c) & (d): REVIEW OF
INITIAL RESOURCE PLAN SUBMITTED DECEMBER 1, 2006 (OPENED
JANUARY 23, 2007, PSC DOCKET NO. 07-20**

**Jeremy Firestone's Request to Delay a Portion of Delmarva Power's Land-
Based Wind RFP**

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Pro Se

In December 2006, Delmarva Power submitted a patently defective draft IRP in this docket. In April 2007, I filed a request for discovery regarding the IRP. Given the pending RFP proceedings and the relationship between my discovery request and the RFP, discovery was not permitted to proceed at that time.

In the October 22, 2007 letter to the parties, you established March 5, 2007 as the deadline for Delmarva Power to submit a revised IRP. You also established March 12, 2007 as the date on which a scheduling conference would occur to set the remainder of the schedule in the docket, including discovery. That schedule was established after Delmarva Power had twice requested an extension of time to accommodate the resolution of the RFP docket. Because Delmarva did not inform the parties to this docket of its intention to issue an RFP for new land-based wind power, this week we were left to learn of it through press accounts. See <http://www.delawareonline.com/apps/pbcs.dll/article?AID=2008801230333>.

I am pleased that Delmarva Power is seeking wind power to fill in the gap between now and 2014 when the Bluewater Wind project is scheduled to be on-line (ibid). I do however find Delmarva Power's overall approach troubling, particularly in light of the history of this docket.

Indeed, it appears that Delmarva Power is not attempting to advance the IRP so much as it is trying to use the IRP process to collaterally attack the RFP process—the very process whose

uncertainty Delmarva previously pointed to as the reason it needed to delay the IRP. Gary Stockbridge the President of Delmarva Power was clear on the intention behind the land-based wind RFP when he declared in the press release:

“We will have the results in hand by March that can be compared to the existing offshore proposal. We expect to see significantly lower costs, the same environmental benefits, far less risk, even more stability than with offshore wind power, and be able to provide this power years ahead of any offshore project”

<http://www.delmarva.com/welcome/news/releases/archives/2008/article.aspx?cid=918>. The press release went on to note that: **“This request for competitive onshore wind bids is part of Delmarva Power’s Integrated Resource Planning process, which began in 2006.”** That puts the land-based wind farm RFP front and center in this docket.

Delmarva Power previously objected to my discovery request as an attempt to use the IRP process to gain discovery into (and thus bolster) the RFP process. Delmarva Power now seeks to use (and abuse) that very same IRP process, not to foster long-term planning, but as is apparent from President Stockbridge’s own words, to attack the RFP process.

As a result, it is only fair that the portion of the land-based wind RFP process that concerns energy delivery after 2014 (when the Bluewater project is scheduled to be operational) be held in abeyance until after the resolution of the RFP. At that time, we will know whether the offshore wind farm will be a part of Delmarva’s portfolio and thus, how additional land-based wind (if the Bluewater contract is approved) or substitute land-based wind (if the Bluewater contract is not approved) will fit within the IRP. Wind bids that would fill the gap—that is, those that provide wind power between now and 2014 should proceed unabated.

If you deny this request and allow the land-based wind RFP to proceed now in its entirety, then I request that you authorize discovery of Delmarva now on one issue—that being, the land-based wind RFP.

I would also request that Delmarva be ordered to serve a copy of the RFP on the parties to this docket.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeremy Firestone". The signature is fluid and cursive, with the first name "Jeremy" written in a larger, more prominent script than the last name "Firestone".

Jeremy Firestone